



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 28, 2025

By Email and ECF

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

| Bates No. | Description of Item |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| EDNY_050121-EDNY_050143 | Draft translation of chats from one silver Macbook Pro, serial number C02T89XXGTF, that was seized at the Sun and Hu Residence |
| EDNY_050144-EDNY_050146 | Charts of header information regarding Linda Sun's email account (responsive report previously produced as EDNY-037877) |

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOHN J. DURHAM
United States Attorney
Eastern District of New York

By: /s/ Alexander A. Solomon
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